



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 13, 2021

BY ECF

Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
New York, New York 10007

Re: *United States v. Hamid Akhavan et al.*, S3 20 Cr. 188 (JSR)

Dear Judge Rakoff:

The Government writes respectfully in connection with yesterday's proceeding concerning the introduction of certain documents pertaining to the Government's enforcement priorities. (*See* Tr. dated Mar. 12, 2021, at 1504-1515). The parties have conferred, and agree that any party can introduce the following three documents through a summary witness: (1) Memorandum dated February 14, 2014, entitled *Guidance Regarding Marijuana Related Financial Crimes* (the "Cole Memorandum," Akhavan Ex. HA-E-8009); (2) Memorandum dated January 4, 2018, entitled *Marijuana Enforcement* (the "Sessions Memorandum," Akhavan Ex. HA-E-8013); and (3) Guidance dated February 14, 2014, entitled *BSA Expectations Regarding Marijuana-Related Businesses* (the "2014 FinCEN Guidance," Akhavan Ex. HA-E-8010). The Government otherwise reserves its rights to object to arguments the defense may wish to present to the jury arising from those documents.

Very truly yours,

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cc: all counsel of record (by ECF)